

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF  
PENNSYLVANIA**

SEUBERT & ASSOCIATES, INC. and	:	Case No.: 2:20-cv-01880-MJH
TEAM TEN LLC, d/b/a AMERICAN	:	
EAGLE PAPERMILLS,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
THE AMBASSADOR GROUP LLC,	:	
d/b/a AMBASSADOR CAPTIVE	:	
SOLUTIONS	:	
And BRANDON WHITE	:	
	:	
Defendants.	:	

**Plaintiff Seubert & Associates, Inc.’s Motion for Summary Judgment on Count III of  
Plaintiffs’ Amended Complaint**

1. Plaintiff Seubert & Associates, Inc. (“Seubert”) moves for summary judgment on Count III of Plaintiffs’ Amended Complaint, pursuant to Federal Rule of Civil Procedure 56 and Local Rule of Civil Procedure 56. Seubert incorporates by reference its Concise Statement of Material Facts and Memorandum in Support and the Appendix thereto. Counsel for all parties discussed the grounds for this Motion on August 29, 2022. Defense Counsel opposes the relief requested.

2. Plaintiff Seubert is an insurance brokerage located in Pittsburgh, PA. Plaintiff Team Ten LLC, d/b/a American Eagle Papermills (“AEP”), operates a paper mill in Tyrone, PA 16648. (Plaintiffs’ Amended Complaint Paragraphs 1-2) (Appendix 1).

With Seubert as its broker, AEP hired Defendants Ambassador Group, LLC and Brandon White to obtain \$13 million dollars in insurance coverage by creating a captive insurance program.

Plaintiffs aver that the Defendants breached their agreement to do so.

3. In the course of the parties' dealings, Seubert purchased insurance coverage for AEP to cover gaps in the insurance coverage that Defendants had agreed to provide but falsely represented that it had acquired. Count III of Plaintiffs' Complaint avers that the Defendants agreed to pay Seubert \$300,000.00 to compensate for Seubert purchasing this insurance, and that the Defendants failed to pay this amount to Seubert. This is the essence of the parties' disputes.

Because there is no genuine dispute that the Defendants agreed to pay \$300,000.00 to Seubert, the Motion for Summary Judgment on Count III of Plaintiffs' Amended Complaint should be granted.

A prepared order is attached.

Respectfully submitted,

**/s/ W. David Slomski**

PA Attorney No.: 32255

Law Offices of W. David Slomski, Esquire, RPLLC

210 Federal Street, Suite 200

Pittsburgh, PA 15212

(412)391-8443x105

dslomski@slomskilawpa.com

Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

**I hereby certify that a true and correct copy of the foregoing** Plaintiff, Seubert & Associates, Inc.'s Motion for Summary Judgment on Count III of Plaintiffs' Amended Complaint was served upon the following counsel by email, this 31<sup>st</sup> day of August, 2022 as follows:

**Brad S. Keeton  
brad.keeton@skofirm.com  
Culver V. Halliday  
culver.halliday@skofirm.com  
Kevin A. Imhof  
kevin.imhof@skofirm.com  
Stoll Keenon Ogden, PLLC  
500 West Jefferson Street  
Suite 2000  
Louisville, KY 40202**

**Attorneys for Defendants, The Ambassador Group, LLC and Brandon M. White**

**/s/ W. David Slomski**

W. David Slomski, Esquire  
Attorney for Plaintiffs, Seubert & Associates, Inc. and  
Team Ten, LLC d/b/a American Eagle Papermill